

***S.M.E. Holding Corp.***

2618 Halperin Avenue

Bronx N.Y. 10461

(718) 931-3295

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SMEKEYFOOD@AOL.COMDATE: 5/27/03TO: AGRICULTURAL MARKETING SERVICE - USDAATTN: COUNTRY OF ORIGIN LABELING (COOL)FROM: SAL BONAUITA -REMARKS: PLEASE SEE FOLLOWING FROM OUR
LOCATIONS -TOTAL PAGES: (7)

**BUHRE AVENUE FOODS
3043 BUHRE AVENUE
BRONX, NEW YORK 10461**

May 27, 2003

Country of Origin Labeling Program
Agricultural Marketing Service, USDA
Stop 0249, Room 2092-S
1400 Independence Avenue, S.W.
Washington, D.C. 20250-0249

Gentleman:

We have reviewed the Country of origin labeling rules in the federal Register.

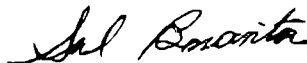
The voluntary guidelines as written will provide a framework for a system that will shift costs and record keeping burdens to Independent Retailers that will have to be reflected in consumer prices.

The current COOL requirement would hold retailers accountable for maintaining a complete and verifiable two-year audit trail for covered items at store level. The records would go as far as having to indicate where an animal was born or the country in which a produce item was grown. This burden of proof should be the responsibility of producers and suppliers. They should be certifying the country of origin.

The USDA has drastically underestimated the cost burden that the record keeping alone would place on an Independent retailer. AMS (Agricultural Marketing Service) estimated the cost at \$628 million per year for retailers for the first year alone and that does not include costs for printing and applying labels and changes to computer systems.

The entire COOL program is anti-small business. Independent Retailers will face disproportionately higher compliance costs as compared to our larger competitors.

Thank You,



Sal Bonavita
President

**LYDIG FOOD CORPORATION
751 LYDIG AVENUE
BRONX, NEW YORK 10462**

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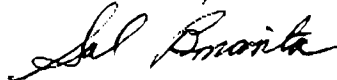
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**TREMONT FOOD CORPORATION
2722 EAST TREMONT AVENUE
BRONX, NEW YORK 10461**

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Sal Bonavita
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**BELFIORE FOOD CORPORATION
4171 WHITE PLAINS ROAD
BRONX, NEW YORK 10466**

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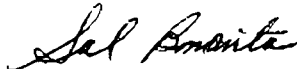
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**E. 204TH FOOD CORPORATION
132 BRONX RIVER ROAD
YONKERS, NEW YORK 10704**

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President

**WESTCHESTER AVENUE FOOD CORPORATION
3151 WESTCHESTER AVENUE
BRONX, NEW YORK 10461**

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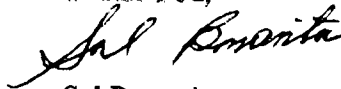
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